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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SCOTT FREEMAN, M.D., as trustee  
for the SCOTT MITCHELL FREEMAN  
REVOCABLE LIVING TRUST, dated  
March 10, 2012, for itself and as  
assignee of FERDINAND BELGA;

Plaintiff,

*vs.*

STEPHEN HURST; SUNRAY ASSET  
MANAGEMENT, INC.; NICO FORTE;  
CERUVIA LIFESCIENCES f/k/a CH TAC,  
LLC f/k/a SAVANT TAC, LLC; CAREY  
TURNBULL; RUSSELL BURBANK, as  
liquidating trustee for nominal  
defendants SAVANT ADDICTION  
MEDICINE, LLC and SAVANT HWP  
HOLDINGS, LLC; DOE INDIVIDUALS 1  
through 20; and ROE CORPORATIONS 1  
through 20,

Defendants,

*and*

SAVANT ADDICTION MEDICINE, LLC;  
SAVANT HWP HOLDINGS, LLC; and  
SAVANT HWP, INC.

Nominal Defendants.

Case No. 2:22-cv-01433-RFB-VCF

**STIPULATED MOTION AND ORDER  
TO EXTEND DEADLINE:**

- (1) TO AMEND COMPLAINT  
(FIRST REQUEST)**
- (2) TO RESPOND TO  
COUNTERCLAIM (ECF No.  
7) (FIRST REQUEST)**
- (3) TO RESPOND TO MOTION  
TO DISMISS OR FOR MORE  
DEFINITE STATEMENT  
(ECF No. 6) (SECOND  
REQUEST)**
- (4) FOR DEFENDANTS TO  
RESPOND TO COMPLAINT  
(FIRST REQUEST)**

1 The parties hereby stipulate and agree to extend the case deadlines as fol-  
2 lows:

3 1. A 21-day extension, through Friday, October 21, 2022, for Scott  
4 Freeman, M.D., as trustee for the Scott Mitchell Freeman Revocable Living  
5 Trust, dated March 10, 2012, for itself and as assignee of Ferdinand Belga  
6 (“plaintiff”) to amend his complaint. This is the first request to extend this  
7 deadline.

8 2. A 10-day extension, through Friday, October 21, 2022, for plaintiff  
9 to respond to defendant Stephen Hurst’s counterclaims for damages (ECF No.  
10 7). This is the first request to extend this deadline.

11 3. A 21-day extension, through Friday, October 21, 2022, for plaintiff  
12 to respond to defendants Sunray Asset Management, Inc., Savant HWP, Inc.,  
13 and Nico Forte’s motion to dismiss or for more definite statement (ECF No. 6).  
14 This is the second request to extend this deadline.

15 4. An extension through November 21, 2022, for defendants to respond  
16 to the complaint and to amend counterclaims. This is the first request to ex-  
17 tend this deadline.

18 There is good cause for this extension. Plaintiff’s counsel has been en-  
19 gaged in simultaneous state-court jury trials—lead counsel in a trial in Las Ve-  
20 gas, and other counsel in a trial in Reno. This has detracted from counsel’s abil-  
21 ity to complete the amended complaint. Plaintiff’s counsel will work diligently  
22 during the extension period and will continue to accommodate reasonable re-  
23 quests from opposing counsel.

24 IT IS SO ORDERED:

25 

26 RICHARD F. BOULWARE, II  
27 United States District Judge

28 DATED this 9th day of October, 2022.

1 Dated this 30th day of September, 2022.

2 LEWIS ROCA  
3 ROTHGERBER CHRISTIE LLP

KAEMPFER CROWELL

4 By: /s/ Abraham G. Smith  
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trustee for nominal defendants  
Savant Addiction Medicine,  
LLC and Savant HWP Hold-  
ings, LLC*

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Inc., Savant HWP Holdings, Inc. and  
Nico Forte*

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ants Savant Addiction Medicine  
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ings, LLC*

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23 *Attorneys for Defendants Ceruvia  
Lifesciences LLC and Carev Turnbull*

24  
25 **IT IS ORDERED.**

26  
27 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

28 DATED: \_\_\_\_\_